

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TINA SHEPARD,

Plaintiff,

v.

UNITEDHEALTHCARE OF OREGON,
INC., and DOES I–III,

Defendants.

Case No. 2:24-cv-01495-MJP

**STIPULATED MOTION TO AMEND
COMPLAINT AND EXTEND
DEADLINE TO ANSWER AND
[PROPOSED] ORDER**

NOTE ON MOTION CALENDAR:
March 18, 2025

Plaintiff Tina Shepard and Defendant UnitedHealthcare of Oregon, Inc. (United), by and through their respective counsel, met and conferred on March 17, 2025 to discuss Ms. Shepard's Second Amended Complaint (Dkt. 30). Based on discovery that has been produced, and in an effort to narrow the issues before the Court, the parties respectfully stipulate and move the Court as follows:

1. Ms. Shepard may amend her Second Amended Complaint to reflect information produced in discovery, and in conformity with the directives provided in the Court's Order Dismissing in Part (Dkt. 28). United consents to Ms. Shepard's ability to further amend her Second Amended Complaint in this manner. Accordingly, amendment is authorized under Federal Rule of Civil Procedure 15(a)(2). The parties stipulate and agree that Ms. Shepard must file her amended pleading by March 21, 2025.

2. The current deadline for United to respond to Ms. Shepard's Second Amended Complaint is March 21, 2025. In light of Ms. Shepard's likely further amendment to her pleadings,

the parties stipulate and agree to extend the time for United to file a responsive pleading by two weeks, to April 4, 2025.

The parties agree there is good cause for this relief to better conform the pleadings with facts now known by all parties based on discovery that has been exchanged and, accordingly, to narrow the issues in dispute for the Court to decide.

IT IS SO STIPULATED by and between the parties.

DATED: March 18, 2025

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I certify that this memorandum contains 242 words, in compliance with the Local Civil Rules.


[PROPOSED] ORDER

Having considered the parties' forgoing stipulated motion, the Court hereby ORDERS as follows:

Ms. Shepard may file a further amended complaint by March 21, 2025 to reflect information produced in discovery, and otherwise in conformity with the directives provided in the Court's Order Dismissing in Part. The deadline for United to file a responsive pleading is extended to April 4, 2025.

IT IS SO ORDERED

DATED this 21st day of March, 2025.



THE HONORABLE MARSHA J. PECHMAN
UNITED STATES DISTRICT COURT JUDGE